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UNITED STATES DISTRICT COURT
District of Boston, Massachusetts Civil Division

January 17, 2025

Case No.

Rev. Torli H. Krua, Pro Se, Asia Flumo, Pro Se, Wachen Flumo, Pro Se, Peter D. Brown, Pro Se, Michael Mendoabor, Pro Se, Mariam Meiplay, Pro Se, Kodjo Bah, Pro Se,

v.

DEFENDANTS: United States Government, President Joseph Biden, Antony Blinken, Secretary of State, Hon. Merrit Garland, Attorney General United States of America, Alejandro Mayorkas, Secretary of Homeland Security, Oprah Winfrey

COMPLAINT FOR INJUNCTIVE RELIEF AND DAMAGES

INTRODUCTION

1. This is an action for injunctive relief and damages arising from injuries deliberately, unlawfully, and maliciously inflicted upon Plaintiffs due to their race and national origin. Plaintiffs assert violations of constitutional and statutory rights and seek remedies for historical and systemic injustices perpetrated by the Defendants.
2. Plaintiffs, predominantly of Liberian descent, possess deep ancestral and historical ties to the United States, predating the American Declaration of Independence. Despite these contributions, Plaintiffs have been subjected to systemic racism, discriminatory practices, and deliberate marginalization orchestrated by the Defendants and their predecessors.
3. With the West Coast USA burning in deadly wildfires in winter and the East Coast USA in deadly snow storms the lives of Liberians denied green cards in America are at serious risk. The situation is inflamed by profile celebrities like Oprah Winfrey (<https://youtu.be/YmU6SvTpJhl?si=iHHvtEGa477PpbRf>) spewing hate and repeating two-century-old false narratives from the US Government

denigrating American citizens settled in Liberia as "trash", "criminals," "freed slaves" or "liberated American slaves" and President Trump promising mass deportation of criminals urgent injunctive relief will save lives of Liberians.

Addresses:

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Plaintiffs

% Rev. Torli H. Krua

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Defendants:

Hon. Alejandro Mayorkas

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For Secretary of State Antony Blinken:

Hon. Antony Blinken

Secretary of State

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U.S. Attorney for the District of Massachusetts

Attention: First Assistant U.S. Attorney Jodi L. Wu

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JURISDICTION AND VENUE

3. Federal District of Boston, Massachusetts Jurisdiction is proper under 28 U.S.C. § 1331 for federal question jurisdiction, 28 U.S.C. § 1343 for civil rights violations, or applicable international human rights treaties.
4. Venue is proper in this District pursuant to the fact that Massachusetts was the first colony to legalize slavery as well as the first to abolish slavery (Brom & Betts V. Ashley), as the acts and omissions giving rise to this Complaint occurred within the jurisdiction of this Court.
5. Because of the December 15, 1821 Treaty, Under 28 U.S.C. § 1331, federal courts have jurisdiction over cases arising under treaties.

FACTUAL BACKGROUND

7. Long before the time of European colonization, Indigenous peoples inhabited and thrived on the lands now known as the United States of America. Colonization introduced systemic slavery, land theft, and cruelty against Indigenous nations and people of color.
8. Liberians, including Plaintiffs and their ancestors, have longstanding ties to the United States. Many were forcibly removed to Africa under U.S. government policies, such as the colonization efforts of the **Society for the Colonization of Free People of Color of America**, supported by the U.S. Navy and funded by federal tax dollars.

9. The American Declaration of Independence (1776) and the Massachusetts Constitution (1780) created the blueprint for American democracy and freedom, the fact that our ancestors were in the USA before the adoption of the US Constitution firmly established citizenship rights for all persons born in Liberia.
10. The Landmark lawsuit, Brom & Betts V. Ashley is a testament to justice, security, democracy, and the rule of law, when the verdict from an all-white jury not only set an enslaved Black woman free from a wealthy white man, it also awarded 30 Shillings in damages to the Black woman.
11. American democracy and greatness of 1781 was short lived After the US adopted its first constitution **Article I, Section 2, Clause 3** included $\frac{3}{5}$ compromise in counting slaves and accommodated slavery with the federal government earning \$10 for each slave imported to the US.
12. The First Nationality Act (1790) codified racism by restricting citizenship to "free white persons." This legislation laid the foundation for a racially discriminatory legal framework that persists today with US visa waivers benefiting 42 countries worldwide but excluding all African nations, including Liberia, an American jurisdiction purchased with American taxes, under a treaty that "relinquished forever" a territory in Africa, "for settlement of citizens of the US." It inspired the **Indian Removal Act** (1830), the **Chinese Exclusion Act**, and the 2025 racist US visa refusal rate for Liberia; 78.19%, compared to the worst visa overstays country on Earth, Nigeria, with 29.23%, Russia, 39.49% and Iran 53.26%. The European colonizers' and slaveholders' racist plan of cruelty to indigenous Americans, and Liberians, and the whitewashing of the USA is still working and still protected under President Biden.
13. In Opinion #229, Attorney General William Wirt explicitly advised against the colonization of U.S. citizens, highlighting the illegality and harm of such actions. Despite this, the U.S. government continued to support colonization, resulting in the deaths of many forcibly relocated individuals.
14. On December 15, 1821, a secret Treaty ordered by President James Monroe between the US Government and King Zoda secured land to settle citizens of the United States of America forever, long before the American Colonization Society

was incorporated in 1837. The dead slaveholders' effort to deprive American citizens of life, liberty, and happiness forever cries out for an urgent injunctive relief, 200 years overdue. Treaty-Making Power (Article II, Section 2, Clause 2) Supremacy Clause of the U.S. Constitution (Article VI, Clause 2) Foreign Relations Law (Title 22, U.S. Code)

15. President William Howard Taft's admission of this crime in his First Annual Message to Congress (December 7, 1909) "The interest of the United States in the Republic of Liberia springs from the historical fact of the foundation of the Republic by the colonization of American citizens of the African race..."
16. Oprah Winfrey amplifies the Hate Crime, by repeating the slaveholders' narrative: "Liberia was founded in 1821 by liberated American slaves," further inflicting more injuries. (<https://youtu.be/YmU6SvTpJhI?si=iHHvtEGa477PpbRf>)

CAUSES OF ACTION

Count I: Violation of the Equal Protection Clause (14th Amendment)

11. Defendants, through their actions and omissions, violated Plaintiffs' rights to equal protection under the law by perpetuating systemic racism and discriminatory policies, including the exclusion of thousands of Liberian refugees as beneficiaries of the Liberian Refugee Immigration Fairness Act signed by President Trump. Deny access to humanitarian assistance, and permits to work and continue their education. The Equal Protection Clause is primarily guaranteed by the Fourteenth Amendment to the United States Constitution, the Civil Rights Act of 1964, Title VI, Tenth Amendment of the US Constitution. Equal Educational Opportunities Act (EEOA) (20 U.S.C. § 1703):

Count II: Violation of Civil Rights Act of 1866, Civil Rights Act of 1964 (42 U.S.C. § 2000a, et seq.) Title II: Title VI, Civil Rights Act of 1866 (42 U.S.C. § 1981)

12. Defendants' actions contravened the Civil Rights Act of 1866 by denying Plaintiffs the full and equal enjoyment of rights guaranteed to all U.S. citizens. Colonized American citizens in Liberia. Conduct flawed interviews denying Liberians

freedom to travel to the United States and financially exploiting Liberians of millions of dollars for nonrefundable visa fees. Initiated and sustained discrimination through US taxpayers funded 1st and 2nd class citizenship in Liberia and a flawed electoral system that is financially burdensome and not free or fair.

Count III: Violation of International Human Rights Law & The Universal Declaration of Human Rights: Universal Declaration of Human Rights (Articles 1, 13, 14, 15, 21, 23, & 26)

13. Defendants violated international treaties and customary international law, including the Universal Declaration of Human Rights and the International Convention on the Elimination of All Forms of Racial Discrimination, by engaging in and perpetuating systemic racial discrimination. Supports racism of white missionary agencies with federal tax exemption that discriminates in employment, housing, and education.

Count IV: Colonizing American Citizens Violates the U.S. Constitution (1788)

Article II, Section 1, Clause 5 and the American Declaration of Independence (1776) “All men are created equal...” and the Massachusetts Constitution (1780) “All people are born free and equal and have certain natural, essential, and unalienable rights;... *No Person except a natural born Citizen, or a Citizen of the United States, at the time of the Adoption of this Constitution, shall be eligible for the Office of President;* “

INJURIES AGAINST PLAINTIFFS

14. When civil war erupted in Liberia in 1989, the nation’s infrastructure and government collapsed. Plaintiff, Krua, then in Boston, was contacted by the U.S. State Department to address computer issues at the U.S. Embassy in Monrovia. He was transported to the embassy compound by military helicopter and provided housing. While there, he witnessed a Liberian woman and her child being violently assaulted and removed from the US Embassy after being denied a visa. When Plaintiff later applied for a visa, he too was rejected and informed that the U.S. State Department had banned Liberians from obtaining visas—a policy he was told was “classified.”

Like all Liberians, they were put through a flawed interview process, fully aware of the order not to grant visas to Liberians. In 2025, with the 78.19% refusal rate, the flawed interview continues in Monrovia against people who were issued visas, traveled to the USA, and returned on time, only to be denied visas and their money taken.

15. Outraged, Torli bypassed the State Department and wrote directly to President George H.W. Bush, Congress, and the Supreme Court on November 28, 1990, highlighting systemic racism against Liberians and calling for America to end centuries of racial discrimination against all descendants of American citizens settled in Liberia. This act of defiance led to retaliation by the Government of the United States, including his dismissal from Wang Computers.

16. Defendant retaliated against Plaintiff's opposition to discrimination, effectively ending Plaintiff's career. As a direct result of Defendant's discrimination and retaliation due to race and national origin, Plaintiff remains traumatized and continues to suffer damages, including but not limited to ongoing injuries, emotional distress, and financial losses.

17. Wachen Love Flumo was born in Liberia and forced to become a refugee due to the violence of the Liberian Civil War that was plotted by Charles Taylor Ellen Johnson Sirleaf and others in Boston, Massachusetts. Since December 23, 2015, she has been subjected to civil rights violations and equal protection violations, being unjustly excluded as a beneficiary of the LRIFA.

18. Asia Flumo is the daughter of Wachen Flumo who was born in Granada after she fled Liberia. Pro Se Plaintiffs, the Flumos came to America seeking a safe place from the violence. Upon arrival in Boston, they presented themselves to immigration authorities as refugees of the Liberian Civil War. Ms Flumo and her daughter were denied access to humanitarian assistance and permits to work and sustain themselves because of their race and Liberian origin. Other Liberian refugees similarly situated were included as beneficiaries of the Liberian Refugee Immigration Fairness Act but the Flumos were unjustly excluded.

19. Asia, daughter of a Liberian refugee woman, a straight "A" high school graduate is depressed, unable to go to school, and has been denied permits to work.

20. Plaintiff Marian is a successful female Liberian entrepreneur who applied for a B1/B2 visa to travel to the USA and return. Plaintiff submitted documentary evidence of strong economic,

family, and cultural ties to Liberia, as well as her rights under American, Liberian, and international law:

Business Ownership: As the founder and CEO of Liberia's only chain of smoothie and juice bars, Plaintiff employs eight people and generates US\$70,000 in annual sales. Her business is valued at nearly \$250,000, with assets exceeding \$150,000. She also recently completed training at the U.S. Embassy's Academy for Women Entrepreneurs.

Family and Financial Stability: Plaintiff has a 4-year-old son and a fiancé, Mr. Jefferson Krua, a civil and transportation engineer with degrees from Virginia Tech. He moved to Liberia in 2015, where he has made significant investments, including the first Pinkberry franchise and Authentic Taste Sinkor restaurant. He works for USAID's Feed the Future Liberia program and has also worked with the Millennium Challenge Account Liberia. Our family is financially secure in Liberia.

Travel History: She has traveled to China, Ivory Coast, and Ghana in the past five years and returned to Liberia each time to continue her business engagements.

21. Plaintiff Michael Mendoabor Plaintiff Mendoabor applied for a green card under the LRIFA, and paid the fees imposed by the Immigration Service, contrary to Section 245 (i), which forbids the payment of fees for refugees. He was unjustly denied due to an equal protection violation.

22. Witness: X, a traumatized Liberian mother of a U.S. Army who died in Massachusetts, USA. The Plaintiff has visited the United States several times and returned to Liberia. However, after her daughter's death, she was denied a visa many times and she had to pay a nonrefundable fee of \$160 during each denial. She still hasn't had closure.

23 Plaintiff: Peter Brown, was born in Liberia. After his father died in the United States, he was awarded \$239,249.14 US Dollars by the court for his inheritance from his father. Peter has been denied three times and prevented from coming to the United States to claim his money.

24. Witness: Ellis Molubah was awarded a scholarship to pursue his master's degree for \$17,500 and \$20,000 at the Columbia Theological Seminary and Louisville Presbyterian Seminary respectively. The plaintiff was denied a visa multiple times and paid over \$350

nonrefundable visa fees.

25. Witness: Ms Dahn, a Liberian whose father lives in New Jersey and resided in the Philippines, traveled to Monrovia after she was awarded a scholarship to study in the United States, where her father resides. She was denied multiple times and her visa fees were forfeited.

26. Witness: Rev. Moses Kpah, an ordained minister of the gospel visited the United States and returned before his stay expired. When he applied to visit his mother, the late Martha Makor, he was denied a visa and forfeited \$160 in visa fees. His mother later died in the USA.

27. Mr. Enoch Kpah desires to visit his sister, a US citizen. He believes he is an American and doesn't want to pay for a visa to visit his country. Includes details of ongoing harm, violations of the law, and any previous efforts to resolve the dispute.

PRAYER FOR RELIEF

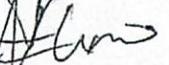
WHEREFORE, Plaintiffs respectfully request that this Court grant the following relief:

- A. Issue a declaratory judgment that Defendant's actions violated Plaintiffs' constitutional and statutory rights;
- B. Issue an injunction prohibiting Defendants from continuing discriminatory practices; *halt requiring visa for persons born in Liberia Traveling & working in the USA.*
- C. Award Plaintiffs compensatory and punitive damages in an amount to be determined at trial;
- D. Order Defendants to establish a reparative framework addressing historical and systemic injustices against Plaintiffs;
- E. Award Plaintiffs reasonable attorneys' fees and costs;
- F. Grant such other and further relief as the Court deems just and proper.

DEMAND FOR JURY TRIAL

Respectfully Submitted: Rev. Torli H. Krua, Pro Se, Asia Flumo, Pro Se, Wachen Flumo, Pro Se, Peter D. Brown, Pro Se, Michael Mendoabor, Pro Se, Mariam Meiplay, Pro Se, Kodjo Bah, Pro Se,

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